FCM

FEDERATION OF CANADIAN MUNICIPALITIES

RESPONSE TO

TRANSPORT AND ENVIRONMENT CANADA

CONSULTATIONS ON EMISSION REDUCTION OPPORTUNITIES

SEPTEMBER 1989

40992

Federation of Canadian Municipalities
Fédération canadienne des municipalités

24, rue Clarence Street
Ottawa, Ontario K1N 5P3
(613) 237-5221
Fax / Télécopieur: (613) 237-2965
Envoy 100: FCM.ADMIN
Telex: 053-4451
International Office/
Bureau international (613) 563-3506

His Worship **George F. Ferguson**
Abbotsford, British Columbia
President
Président

Councillor **Ray O'Neill**
St. John's, Newfoundland
First Vice President
Premier vice-président

Councillor **Doreen Quirk**
Markham, Ontario
Second Vice President
Deuxième vice-présidente

Son honneur **Margaret Delisle**
Sillery (Québec)
Third Vice President
Troisième vice-présidente

His Worship **George B. Cuff**
Spruce Grove, Alberta
Past President
Président sortant

James W. Knight
Executive Director
Directeur général

FEDERATION OF CANADIAN MUNICIPALITIES
RESPONSE TO
TRANSPORT AND ENVIRONMENT CANADA
CONSULTATIONS ON EMISSION REDUCTION OPPORTUNITIES

INTRODUCTION

The Federation of Canadian Municipalities (FCM) represents municipalities across Canada. Our membership comprises over 500 individual municipalities, as well as each provincial and territorial municipal association. Over 70% of the Canadian population resides in FCM member municipalities.

Our mandate is to pursue common national interests of all Canadian municipalities, particularly as these are affected by actions of the Government of Canada, or of the provinces and territories acting at the inter-provincial level. We serve as a central linkage among municipalities to share information and work towards common goals.

The National Board of Directors which comprises 65 elected municipal officials meets four times a year. The annual conference of the FCM typically draws around 1,000 delegates. We have a number of standing committees and task forces which examine a broad range of issues including environmental, national transportation, municipal finance, and housing issues.

THE ROLE OF MUNICIPALITIES ON ENVIRONMENTAL ISSUES

Although municipal government is not typically viewed as the source of macro-policies on the protection the environment, the nature of municipal government puts it in a position to play a key role. Local government is responsible for waste management, water and sewage treatment, public transit, land use and road systems. In at least one province municipalities have been given responsibilities in the area of air quality management. These responsibilities among others deal with issues which have a direct impact on the environment.

FCM is active in the areas of chlorofluorocarbon and halon reduction, packaging reduction, transportation energy management, and standards for infrastructure maintenance. FCM is participating in several government initiatives relating to these areas, including Globe 90 - a major international conference and trade show on sustainable development opportunities.

In addition, municipalities are responsible for emergency planning, and public health and safety. As our urban centres become denser and the risk of higher numbers fatalities and injuries due to major industrial accidents increases, all governments and agencies need to ensure that adequate assignment of responsibility and coordination takes place. The FCM participates in MIACC -- the Major Industrial Accidents Coordinating Conference to help achieve this goal. MIACC is funded through Emergency Preparedness Canada.

In the United States municipalities have been given the responsibility for enforcing federal air quality standards. Under adverse air quality conditions, municipalities must implement strategies to reduce the number of motor vehicles in use requiring additional enforcement resources. Municipalities must also deal with added pressure on public transportation systems.

The FCM appreciates this opportunity to respond to the federal government's intiatives on the issue emission controls for transportation motor vehicles and industrial equipment.

FCM'S POSITION

The Federation of Canadian Municipalities strongly supports initiatives to reduce emissions from motor vehicles and fuels and from industrial equipment. We are concerned with the health and safety of our residents as well as the future of our global environment.

In supporting such initiatives, there are four basic principles we put forward:

1. Emission controls should be based on engine size and not vehicle size;

2. Emission controls should be based on miles travelled or hours of operation and not vehicle size;

3. Emission controls should include controls on the amount of particulate matter released by internal combustion engines;

4. Emission controls should include controls on the amount of time engine idling is allowed.

Each of these principles and their rationale is explained below.

EMISSION CONTROLS SHOULD BE BASED ON ENGINE SIZE AND NOT VEHICLE SIZE

The proposed emission levels discussed in the Transport/Environment Canada Plan are based on vehicle size. Although engine size is often dictated by vehicle size, it is not always the case. Engine size may be determined by auxillary functions such as construction equipment or container cranes. Engine sizes for the purpose of emission control should be assigned in broad categories to simplify specifications, design and maintenance of emission control equipment. By using the engine size as the basis a more equitable distribution of the responsibility for emission reduction is achieved.

EMISSION CONTROLS FOR VEHICLES OF LESS THAN OR EQUAL TO 3000 TONS SHOULD BE BASED ON MILES TRAVELLED OR HOURS OF OPERATION AND NOT VEHICLE SIZE

This position primarily concerns the group of engines used to power passenger cars and small trucks of up to three tons mainly used for private transportation purposes. These vehicles or engines should be controlled so that all vehicles emit a limited number of grams of pollutants per unit of distance travelled, regardless of their size. In other words, individuals owning larger vehicles should not be allowed to pollute more than those owning smaller vehicles where it is technically possible to achieve the same emission levels.

This requires more stringent controls per unit of fuel consumed on the vehicles at the larger end of the scale. However, these vehicles also have the space to accommodate the equipment to enable the more stringent controls to be met.

For engines of similar sizes not used to propel vehicles, similar standards should be developed to limit a comparable number of grams per hour.

EMISSION CONTROLS SHOULD INCLUDE CONTROLS ON THE AMOUNT OF PARTICULATE MATTER RELEASED BY INTERNAL COMBUSTION ENGINES

Diesel engines, particularly those that are not well-maintained, emit quantities of objectionable black smoke as they change gears during acceleration. The next series of U.S. Emission Controls are expected to rectify this problem. Municipalities which own fleets of diesel-powered transit buses have previously requested that the changes to the emission standards occur at the same time for both diesel buses and diesel trucks since the engines are common to both types of vehicles.

EMMISSION CONTROLS SHOULD INCLUDE CONTROLS ON THE AMOUNT OF TIME ENGINE IDLING IS ALLOWED

We recommend that the amount of time engines can be left idling be limited to 30 minutes. There is no practical basis to allow engines to idle longer. Engine idling is inefficient use of energy as well as a source of noise pollution in our urban environment. This particularly applies to truck and railway locomotives which are left idling during non-working hours or during the weekends in order to avoid the problem of starting in cold temperatures.

GO Transit has developed appropriate technology to maintain diesel coolant temperature to permit quick and easy starts using wayside power. Similarly diesel fuel heaters are available for trucks. These devices should be used to comply with maximum idling rules.

CONCLUSION

We reiterate our support for emission reductions for all vehicles and internal combustion engines. We ask to be consulted when issues of enforcement and implementation are discussed. Through the municipal planning process much can be done in the area of layout and type of transportation systems, location of industrial activity, minimization of damage and/or fatalities caused by major accidents, and the impact of developments on traffic patterns.

The Federation is on record as a strong supporter of off-road modes of transportation to move people and freight. We have recently presented our position on VIA Rail to the federal government hoping that passenger rail service in Canada will be improved and used more efficiently. We also prefer the movement of freight on rail as opposed to road due to the higher risk of accidents on road and the cost of building and maintaining road systems in our municipalities.

Although public transit is primarily the responsibility of provincial/territorial and municipal governments, 75% of Canadians now live in urban areas. This necessitates a comprehensive federal transportation policy which includes federal funding for urban transit. The Federation of Canadian Municipalities has been a long-time advocate of more efficient use of the public transportation dollar. Municipal governments, especially those in large urban centres, have considerable experience managing public transportation systems. Public transit systems are an efficient and environmentally safer method of moving masses of people. We hold that the federal government, if it is to achieve Canada's objective of reduced air pollution, must contribute to public transit. To this end, the FCM has requested over the past several years, a program modelled along the lines of the previous UTAP (Urban Transit Assistance Program) program.

We thank the Transport and Environment Canada for the opportunity to express our views and wish you well in your deliberations. We are anxious to hear the results of your consultations and hope that all efforts currently being undertaken by yourselves and the Canadian Council of Ministers of the Environment (CCREM) are integrated into a comprehensive policy for Canada.

Contact:

Shirley Tom
Director, Policy and Research
Federation of Canadian Municipalities
24 Clarence Street
Ottawa, Ontario
K1N 5P3
(613) 237-5221

OR

Douglas Thwaites
Director, Transportation Policy
Planning Department
Regional Municipality of Peel
10 Peel Centre Drive
Brampton, Ontario
L6T 4B9
(416) 791-9400